IN THE CRIMINAL COURT FOR DAVIDSON COUNTY, TENNESSEE, DIVISION I S/2
TWENTIETH JUDICIAL DISTRICT AT NASHVILLE

STATE OF TENNESSEE

)
vs.

No. 2004-D-3113

## SUPPLEMENTAL MOTION FOR BILL OF PARTICULARS

PERRY AVRAM MARCH

Comes now the Defendant, by and through counsel, pursuant to Article I, § 9 of the Constitution of the State of Tennessee, the Sixth and Fourteenth Amendments to the United States Constitution and Rule 7(c) of the Tennessee Rules of Criminal Procedure, and moves this Court to order the State to promptly furnish a bill of particulars identifying specifically, as to the offense alleged in Count 2 of the indictment, the manner of disposition of the alleged corpse.

This request is supplemental to the motion for bill of particulars previously filed on behalf of the Defendant. Counsel would incorporate by reference the legal authorities cited and argument set forth in support of the prior motion.

THE FOREGOING PREMISES CONSIDERED, the Defendant moves the Court to order counsel for the State forthwith to furnish a bill of particulars including the

information described above.

Respectfully submitted,

JOHN E. HERBISON

# 12659

2016 Eighth Avenue South

Nashville, TN 37204

(615) 297-5900

WILLIAM D. MASSEY

# 9568

LORNA S. McCLUSKY

# 16803

3074 East Street

Memphis, Tennessee 38128

(901) 384-4004

Attorneys for Defendant

## **CERTIFICATE OF SERVICE**

I certify that a correct and complete copy of the foregoing has been hand-delivered or mailed, first class postage prepaid, to the Office of the District Attorney General, 222 Second Avenue North, Nashville, Tennessee 37201, this 774 day of September, 2005.

JOHN E. HERBISON